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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MEREDITH CALLAHAN AND LAWRENCE
GEOFFREY ABRAHAM, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

PEOPLECONNECT, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-09203-EMC

**JOINT STIPULATION TO CONTINUE
HEARING ON PEOPLECONNECT'S
MOTIONS TO DISMISS, STRIKE, AND
STAY DISCOVERY**

Pursuant to Local Rules 6-1 and 6-2, PeopleConnect, Inc. (“Defendant”) and Meredith Callahan, Lawrence Geoffrey Abraham, on behalf of themselves and others similarly situated (“Plaintiffs”), by and through their undersigned counsel, hereby stipulate to continue the date of the upcoming hearing on Defendant’s Motions to Dismiss, Strike, and Stay Discovery. In support of this stipulation, the parties stipulate to the following:

1. Defendant filed Motions to Dismiss, Strike, and Stay Discovery (“Motions”) on March 19, 2021, noticed to be heard on April 29, 2021. (ECF No. 26; ECF No. 28).

2. On March 30, 2021, the Court granted the parties’ joint stipulation to extend Plaintiffs’ deadline to respond to the Motions and rescheduled the hearing date for May 13, 2021. (ECF No. 31).

3. On April 21, 2021, the Court issued an order indicating that the only issue it would hear at the May 13, 2021 hearing was whether the case should be compelled to arbitration, and stating that it would address the remaining issues in the Motions after it resolved the arbitration issue. (ECF No. 34).

4. On May 13, 2021, the Court heard arguments from counsel regarding Defendant’s motion to compel arbitration. (ECF No. 39).

5. On May 18, 2021, the Court denied Defendant’s motion to compel arbitration. (ECF No. 40).

6. On May 18, 2021, after issuing its order denying Defendant’s motion to compel arbitration, the Court re-set the Motions hearing for June 24, 2021. (ECF No. 41).

7. On June 2, 2021, the Court issued a notice rescheduling the Motions hearing from June 24, 2021, to July 9, 2021. (ECF No. 46).

8. On June 16, 2021, Defendant filed its notice of appeal to the Ninth Circuit of the Court’s order denying Defendant’s motion to compel arbitration. (ECF No. 47).

9. On July 1, 2021, Defendant filed a motion to stay proceedings pending appeal of the Court’s decision to deny Defendant’s motion to compel arbitration. Plaintiffs through their counsel intend to oppose Defendant’s motion to stay pending appeal. In its motion, Defendant indicated that it was unavailable for the July 9, 2021 Motions hearing date. (ECF No. 49).

10. On July 2, 2021, the Court rescheduled the Motions hearing from July 9, 2021, to July 12, 2021. (ECF No. 50).

11. Defendant's counsel is unavailable the weeks of July 12, 2021, and July 19, 2021, due to previously-scheduled work commitments. Plaintiff's counsel is unavailable on July 26, 2021 due to previously-scheduled travel.

12. For these reasons, upon electronic conferral, the parties agreed to seek a continuance of the Motions hearing from July 12, 2021, to a date most convenient for the Court between July 27 and July 30, 2021. If the Court is unavailable between July 27, 2021, and July 30, 2021, the parties request that the Motions hearing proceed as currently scheduled on July 12, 2021, at 1:00pm.

13. The Motions hearing date was previously rescheduled as identified above.

The parties therefore respectfully request that this Court reschedule the July 12, 2021 Motions hearing to a date most convenient for the Court between July 27, 2021, and July 30, 2021, to the extent the Court has availability during that time.

Dated: July 2, 2021

JENNER & BLOCK LLP

By: /s/ Kate T. Spelman
Kate T. Spelman

Dated: July 2, 2021

BEN OSBORN LAW

By: /s/ Benjamin R. Osborn
Benjamin R. Osborn

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other Signatories.

Dated: July 2, 2021

/s/ Kate T. Spelman
Kate T. Spelman

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Judge Edward M. Chen
United States District Judge